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VIA ECF

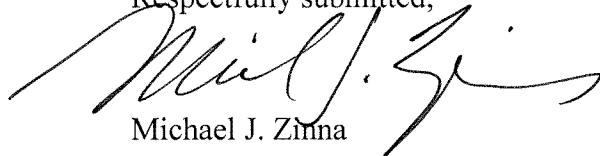
Honorable Loretta A. Preska, U.S.D.J.
United States District Court
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

Re: Bader Media Group v. Freeplay Music, LLC
Case No. 1:16-cv-09998

Dear Judge Preska:

I represent plaintiff Bader Media Group (“Bader”) in the above-referenced action. Bader and Freeplay Music, LLC (“Freeplay”) have reached an agreement in principle to settle all matters between them. The parties anticipate that they will be able to submit dismissal papers within thirty (30) days. Accordingly, I write on behalf of both parties to respectfully request that the Court either: (1) dismiss this action and reserve a thirty (30) day period for either party to reinstate the matter if settlement is not consummated; or (2) stay all proceedings in this action, including Freeplay’s deadline to respond to the Complaint, for thirty (30) days. The parties thank the Court for its attention to this matter.

Respectfully submitted,



Michael J. Zinna

cc: Oren J. Warshavksy, Esq. (via e-mail)